

CHAPTER: V TECHNICAL ELIGIBILITY	SECTION: 8 PRIMARY PREVENTION INITIATIVE	COMAR: 07.03.03.07
--	--	------------------------------

REQUIREMENTS

- A. The Family Investment case manager explains the Primary Prevention Initiative (PPI) requirements to each family applying for TCA
- B. Each child between birth and age 6 (in the calendar year) must receive preventative health care according to the Early and Periodic Screening, Diagnosis and Treatment (EPSDT) schedule
 1. Health care consists of at least one medical check-up within the last year
 - The health care provider gives inoculations as appropriate but regulations do not require that immunizations be up-to-date.
 2. Impose a \$25 disallowance per month to the grant for each child who, without good cause, has not received the medical check-up
 - Keep the disallowance in effect until the family provides proof that the child has had a check-up
 3. There may be times when a customer cannot get a doctor's appointment for several months. If this is the case:
 - Do not impose a disallowance when the customer is unable to access health care. The case manager must ask about the customer's circumstances. Determine if the customer made an attempt to get a health checkup for their child
 - If the customer made an appointment with the health care provider:
 - Document clearly in the narrative that the customer has a future appointment (date, time and provider's name).
 - Set a 745 to follow up in the appointment month
 - Tell the customer to provide verification of the child's check-up. If the customer fails to provide the verification, impose the disallowance
- C. Each child age 7 or older (in the calendar year) must attend school at least 80% of the time or be a high school graduate
 1. At application:
 - Explain the enrollment, attendance and any verification requirement to the customer
 - Children ages 16 and older must have verification of enrollment in school or an alternative course of study that will lead to a diploma or

CHAPTER: V TECHNICAL ELIGIBILITY	SECTION: 8 PRIMARY PREVENTION INITIATIVE	COMAR: 07.03.03.07
--	--	------------------------------

GED and are attending 80 percent of the time or be a high school graduate

- If a 16 or 17 year old child is not enrolled full time in school or pursuing a diploma or GED or is not a high school graduate refer the child to a work activity.
- If the application is during the summer months and enrollment cannot be verified, set a 745 to follow up on enrollment and attendance in October

2. At recertification:

- Children ages 7 and older must be enrolled in school and attending at least 80 percent of the time unless there is good cause. If they are not meeting the attendance requirement apply a \$25 disallowance per child
- Unless they are high school graduates, children ages 16 and older not enrolled in school or an alternative course that leads to a diploma, certificate or GED, must be in a work activity. If not enrolled, the child is not eligible for TCA.
- Local departments must have work activities/programs in place for 16 and 17 year old TCA children who are not enrolled in school or who are high school graduates
- If the 16 or 17 year old child does not cooperate with the work activity without good cause, follow the conciliation and sanction procedures and impose an individual sanction. Remove the needs of the child from the TCA grant
- Children who are 18 and not in school are not eligible for TCA
- If the recertification is during the summer months and current enrollment and attendance cannot be verified, use the most recent verified attendance for the month in the last available school quarter. Set a 745 alert to follow up on enrollment and attendance in October

3. The 80% attendance may be met in one of two time frames:

- The most recent school quarter
- The most recent school calendar month

4. Impose a \$25 disallowance per month to the grant for each child who does not meet 80% attendance and does not have good cause

CHAPTER: V TECHNICAL ELIGIBILITY	SECTION: 8 PRIMARY PREVENTION INITIATIVE	COMAR: 07.03.03.07
--	--	------------------------------

5. Keep the disallowance in effect until the child meets the requirement
 6. When applying the \$25. disallowance, do not apply phantom income, CARES will correctly maintain the Food Stamps at the same benefit level
- D. The child who is a minor custodial parent with a child at least 12 weeks old must attend an educational program leading to a diploma or an alternative educational program or training program approved by the State. When the minor custodial parent fails to meet the 80% school attendance requirement without good cause, do one of the following:
1. Refer the minor parent to an alternative education or training program if he or she is not attending school. If the minor parent complies do not apply a sanction (See Example # 3)
 2. Apply an individual sanction by removing the needs of the minor parent, when the minor parent attends school less than 80% of the time. Enter the amount of the incremental portion as unearned income (phantom) for the food stamp case
 3. Apply a full family sanction and close the case when the minor parent who is head of household attends school less than 80% of the time. The case must remain closed until the minor parent head of household complies with the school attendance requirement

GOOD CAUSE

- A. Do not impose a disallowance or sanction when there is good cause
- B. Allow good cause for failure to meet the health care requirement only when the customer is cooperating with an existing agreement with one of the following programs:
 - Child Protective Services
 - Intensive Family Services
 - Families Now
 - Customer made an attempt but could not get a medical appointment (See Requirements Section B3)

CHAPTER: V TECHNICAL ELIGIBILITY	SECTION: 8 PRIMARY PREVENTION INITIATIVE	COMAR: 07.03.03.07
--	--	------------------------------

- C. Allow good cause for failure to meet the education requirement only when the customer:
1. Is cooperating with an existing service agreement with Child Protective Services, Intensive Family Services, or Families Now
 2. Provides proof of an acute or chronic medical condition of the child
 - Minor parents may claim good cause for failure to meet the attendance requirement because of their own medical condition or their child's medical condition
 3. Provides verification of the death of an immediate family member
 - Allow a maximum of 3 days
 - Define immediate family member as a parent, grandparent, child, sibling, or the caretaker relative of the child
 4. Provides verification of the observance of religious holidays, or
 5. Is a minor parent with a child less than 12 weeks old
- D. Allow good cause, using the criteria in C. above, only if a minor parent is not meeting 80% attendance requirement
- There is no good cause if the minor parent is not enrolled in school, an alternative education program or training program approved by the State

VERIFICATION – HEALTHCARE

- A. Require verification of preventive health once per year for:
1. Children age 6 or younger (in the calendar year) to avoid a disallowance
 2. Adults and children age 7 and above (in the calendar year) to receive the \$20 annual bonus
- B. Acceptable verification includes:
1. **Preventive Health Care Form (DHR/FIA/PPI 1131 – Revised 7/96 or after)**
 2. Statements or other forms from health providers which give the date of the last check-up, a valid provider signature, and telephone number
 3. Documented telephone calls with the health provider

CHAPTER: V TECHNICAL ELIGIBILITY	SECTION: 8 PRIMARY PREVENTION INITIATIVE	COMAR: 07.03.03.07
--	--	------------------------------

- Record the date, name and title of the person contacted, and the specific information verified

- C. If the customer made an appointment with the health care provider:
1. Document clearly in the narrative that the customer has a future appointment (date, time and provider's name)
 2. Set a 745 alert to follow up in the appointment month
 3. Notify the customer that verification of the check up for the child is needed. If the customer fails to provide the verification, impose a disallowance

Note: Immunization cards or records may be used as proof if the document provides enough information indicating a child care check up.

ADDITIONAL BENEFITS

- Authorize a \$20 health allowance once per calendar year for medicine chest supplies for each person in the assistance unit who:
 - Is age 7 or older (in the calendar year)
 - Received a preventive health check-up within the calendar year, and
 - Provides proof of the health check-up

VERIFICATION – SCHOOL ATTENDANCE

- A. Require verification of 80% attendance once per school year
- B. Acceptable verification includes:
1. **School Verification Form (DHR/FIA/PPI/604A)**
 2. School match tapes, microfiche, or other local department/school automated interfaces
 3. Report cards
 4. Statements from the teacher or administrator on school letterhead paper
 5. Documented telephone calls

CHAPTER: V TECHNICAL ELIGIBILITY	SECTION: 8 PRIMARY PREVENTION INITIATIVE	COMAR: 07.03.03.07
--	--	------------------------------

- Record the date, name and title of the person contacted, and the specific information verified
- 6. Diploma
- C. Verify home schooling with the local Board of Education in the jurisdiction where the family lives
 1. Attendance and enrollment requirements are satisfied if the child is in home schooling approved by the Maryland State Department of Education (MSDE)
 2. The customer shall provide the attendance records required by MSDE

VERIFICATION – GOOD CAUSE

- A. Acceptable verification of good cause includes:
 1. Cooperation with a service agreement – local procedures for communicating with Social Services
 2. Acute or Chronic medical condition – doctor’s statement or other medical records
 3. Religious holidays – statement from clergy that specifies the days
 4. Family Death – Obituary notice, death certificate, funeral program, or other similar documents. Relationship to the deceased is needed only if questionable (Allow a maximum of 3 days)
 5. Age of minor’s child – baby’s birth certificate or MMIS, or
 6. Documented telephone calls which prove good cause
 - Record the date, name and title of the person contacted, and the specific information verified
- B. Verify good cause at each redetermination

GOOD CAUSE CALCULATION

- A. Calculate 80% attendance for the child who has been granted good cause due to a death in the family or religious holidays by:
 1. Subtracting the days approved for good cause from the total days absent
 2. Dividing the new number for days absent by the total number of school days

CHAPTER: V TECHNICAL ELIGIBILITY	SECTION: 8 PRIMARY PREVENTION INITIATIVE	COMAR: 07.03.03.07
--	--	------------------------------

- B. Good cause exists when the percentage calculated in A above is 20% or less

IMPOSING THE DISALLOWANCE

- A. If a child age 7 through 15 years old does not meet the 80 percent attendance requirement without good cause, impose a disallowance
- B. If a child age 16 or 17 years old is enrolled in school and does not meet the 80 percent attendance requirement without good cause, impose a disallowance
- C. For any school age child, the case manager should always investigate good cause before imposing a disallowance. The case manager should talk to the caretaker relative to determine:
- Why the child is not enrolled in school or
 - Not meeting the 80 percent attendance, and
 - If a family is not participating in services to resolve the enrollment and/or attendance issue, refer the family to an intervention program

INTERVENTION

- A. Other administrations within DHR, other State Departments or agencies in local jurisdictions may provide assistance in enrolling a child and/or increasing a child's attendance
- B. Local departments may have intervention services already in place to serve the customers in their jurisdictions
- C. Local departments who do not have intervention services in place to meet the needs of these families must explore all available administrations within DHR, the Department of Education, other State Departments and community agencies in order to establish intervention services for their TCA families with school disallowances who are not actively working with an intervention service.

CURING A DISALLOWANCE

- A. Remove the disallowance when one of the following occurs:
1. The customer provides proof that the requirement has been met
 - The health care requirement is met when the customer provides proof that the child received a medical check-up

CHAPTER: V TECHNICAL ELIGIBILITY	SECTION: 8 PRIMARY PREVENTION INITIATIVE	COMAR: 07.03.03.07
--	--	------------------------------

- The 80% attendance requirement is met when the child has attended 80% of the time for the most recent calendar month or the most recent quarter
- 2. Good cause is established
- 3. The child leaves the assistance unit (home)
- B. Remove the disallowance the month after verification is received
- C. Delete the phantom income from the food stamp case

CASE MANAGEMENT TIPS

- A. Children ages 16 and 17 who are not minor parent and who are not enrolled in school or pursuing a diploma are subject to work requirements; do not impose a disallowance.
 - 1. Refer the 16 and 17 year old child who is not a minor parent who is not enrolled in school or pursuing a diploma, to a work activity
 - 2. If the 16 or 17 year old child does not cooperate with the work activity without good cause, impose an individual sanction and remove the needs of the child from the TCA grant
- B. Minor parents, age 16 and 17, who are not enrolled in school or pursuing a diploma are subject to an individual sanction. The minor parent's needs are removed from the grant.
 - 1. The minor parent must be enrolled in school or an alternative education or training program in order to have his or her needs included in the grant
 - 2. Continue to deduct the incremental portion of the grant until the minor parent is enrolled in school or another education or training program which is also the required work activity
 - 3. The minor parent must be enrolled in school in order to remove the sanction penalty. The referral to a work activity does not remove the penalty when a minor parent is not attending school.
 - 4. Initiate the 30-day conciliation period if not already used
- C. Explore deficit budgeting when disallowances are imposed

CHAPTER: V TECHNICAL ELIGIBILITY	SECTION: 8 PRIMARY PREVENTION INITIATIVE	COMAR: 07.03.03.07
--	--	------------------------------

EXAMPLES

Example 1. Ms. Johnson received TCA for herself, her son Mark - age 10, and her daughters Sally – age 5, and Jenny – age 3. Mark is in the 4th grade and has been absent about 40% of the time during the last quarter and the most recent month. Ms. Johnson states that Mark always has a cold or doesn't feel well, but the doctor did not find anything wrong when Mark had his check-up. Sally has all her inoculations, but has not been to the doctor for about 18 months. Jenny had a check-up last week, but is behind on her inoculations. Ms. Johnson and Mark have proof of health check-ups within the calendar year. Ms. Johnson does not have a service case.

- Impose a \$25 disallowance for Mark because he does not meet the attendance requirement and does not have proof of an acute or chronic condition
- Impose a \$25 disallowance for Sally because she has not had a health check-up within the last year, even though she has had all her inoculations
- Do not impose a disallowance for Jenny because she meets the criteria with an annual check-up. There is no penalty for not being up to date on inoculations
- Authorize the \$20 annual health allowance for Ms. Johnson and Mark (\$40 total) because they received health check-ups in the calendar year
- Check for a deficit budget and follow up if needed

Example 2. Ms. Smith receives assistance for herself and her sons, Jim – age 12 and John - age 10. Disallowances were imposed for Jim and John because they were not going to school 80% of the time and there was no good cause. Ms. Smith returned to the local department on May 2 with a statement from John's teacher that he had perfect attendance in April. The statement from Jim's teacher stated that he was there every day, but was late on 15 occasions.

- Remove John's disallowance effective June because he met the attendance requirement for a calendar month.
- Remove Jim's disallowance effective June. He met the 80% requirement and there is no penalty for lateness.

Example 3. Mr. Jones receives assistance for 5 persons, himself and his children, Jane – age 16, Beth – age 15, Ann – age 12, and Beth's son, Brian age

CHAPTER: V TECHNICAL ELIGIBILITY	SECTION: 8 PRIMARY PREVENTION INITIATIVE	COMAR: 07.03.03.07
--	--	------------------------------

14 months. Jane has dropped out of school. Jane dropped out because she says does not like school and she is not doing well. Ann is attending 90% of the time. Brian had his check-up and inoculations.

- Jane's case manager talks with her about the importance of having some kind of training and refers her to a nurse's assistant training program which Jane is required to attend 5 days a week. The case manager updates the FIP plan to reflect the change in Jane's educational goals. Jane complies with the program therefore the case manager does not impose a penalty

Example 4. Ms. Winters has 2-year-old twins, Michael and Matthew. Ms. Winters has severe asthma and is unable to work, but can care for her children. Neither child has been to the doctor in the last year because both have been well and both had all their shots. There is no social service case.

- Impose a disallowance for the twins (\$50 total) because a chronic or acute medical condition is not good cause for failure to meet the health care requirements
- Check for deficit budget and follow up if needed

Example 5. Ms. Summers receives assistance for herself and her son Sam. Sam, who is in the 4th grade, has missed school because of illness. He missed 20 out of 60 days in the last quarter and was absent 33% of the time. Ms. Summers had a statement from Sam's doctor verifying that Sam was hospitalized for 6 school days and recuperated at home for an additional 5 school days.

- Subtract the 11 days missed that are excused for good cause from the days missed
 - $20 \text{ days} - 11 \text{ days} = 9 \text{ days absent without good cause}$
- Divide the days absent without good cause by the total days in the quarter
 - $9 \text{ days} / 60 \text{ days} = 12\% \text{ absent}$
- Do not impose a disallowance because Sam's excess absences were excused for good cause

Example 6: Matilda Martin receives TCA for herself, her son Steve – age 10, daughter Belinda – age 17, daughter Suzanne – age 16, Belinda's son Brandon – age 2 and Suzanne's daughter Holly – age 15 months. All the children meet the PPI requirements, except Suzanne. She dropped out of school last week on her 16th birthday because it had always been very hard for

CHAPTER: V TECHNICAL ELIGIBILITY	SECTION: 8 PRIMARY PREVENTION INITIATIVE	COMAR: 07.03.03.07
--	--	------------------------------

her and she did very poorly. However before she dropped out, she maintained the 80% attendance requirement.

- Refer Suzanne for enrollment in an education or training program through the work program
- Create a **745 Alert** to follow-up on enrollment
- Do not impose a sanction unless Suzanne fails or refuses to participate

Note: If Suzanne was not meeting the 80% attendance requirement, before she dropped out of school, and her needs were removed before her birthday, keep the reduced grant in effect until she is enrolled in an educational or training program through the work program.

ADDITIONAL INFORMATION

- Financial Eligibility – Deficit Budgeting Situations
- Assistance Unit – Basic Unit Requirements
- Assistance Unit – Minor Parent
- Work and Education – Basic Requirements